UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 15 2015

REPLY TO THE ATTENTION OF:

VIA CERTIFIED MAIL: 7011 1150 0000 2640 9098
RETURN RECEIPT REQUESTED

Mr. Dean O. Reed
CBS Corporation
20 Stanwix Street, Room 1009
Pittsburgh, Pennsylvania 15222

RE: Request for 40 C.F.R. § 761.61(c) Approval – Revised PCB Soil Cleanup Plan
CBS Corporation, formerly Westinghouse Electric Corporation Property
1050 Laidlaw Avenue
Cincinnati, Ohio

Dear Mr. Reed:

The U.S. Environmental Protection Agency has completed its review of the revised document *PCB Soil Cleanup Plan,* dated July 28, 2015. This plan details a proposal under 40 C.F.R. § 761.61(c) for the risk-based remediation of PCB contaminated soil at the former Westinghouse Electric Company Apparatus Repair Facility, located at 1050 Laidlaw Avenue, Cincinnati, Ohio. The Cleanup Plan proposes to remove site soils that contain total PCB concentrations above the cleanup level of 1 milligram/kilogram (mg/kg) between 0 and 4 feet below ground surface (bgs), and soils with total PCB concentrations above a site-specific cleanup level of 121 mg/kg between 4 and 6 feet bgs. The total area identified for removal is approximately 72,000 square feet, and consists of excavation depths of 1 to 6 feet bgs, depending on sampling results. Excavated areas will be backfilled with certified clean (total PCBs below 1 ppm) soil to the original grade.

The remedial goal selected for the 0- to 4-foot depth range is the Toxic Substances Control Act (TSCA) Self Implementing Plan unrestricted use cleanup level of 1 mg/kg. Based on restricted use (i.e., limited only to future construction-related activities) at depths greater than 4 feet and up to 6 feet bgs, a site-specific cleanup level of 121 mg/kg was calculated for this depth range.

Based on the anticipated future uses and activities at the Site, along with the proposed remediation and a deed restriction, implementation of this approach will achieve PCB concentrations protective of the potential future receptors at the Site including facility workers, trespassers, and/or construction/utility workers. The remedial goal for the top four feet of soil at the Site will also be protective of receptors with lower frequency of use relative to future site (facility) workers including site visitors/patrons, landscapers, etc. The remedial goal developed for the 4- to 6-foot depth interval is appropriately conservative for shorter term construction worker exposures, and a Soil Management Plan (SMP) will be required for proper handling of impacted soils at depths greater than 4 feet bgs. In addition, a deed restriction will prohibit residential use of the Site and will limit exposures to soils at depths greater than 6 feet bgs by prohibiting soil excavation at these depths unless the activities are done under a site-specific health and safety plan (including specification of appropriate personal protective equipment,

monitoring, etc.), as well as the Soil Management Plan. These additional obligations and conditions are appropriate to mitigate potential exposures to these PCB-impacted site soils.

Subject to the conditions below, this approval is granted in accordance with the federal PCB regulations codified at 40 C.F.R. § 761.61(c), under which the Regional Administrator may approve a method to dispose of PCB Remediation Waste if it is found that the method will not pose an unreasonable risk of injury to human health or the environment. The Regional Administrator has redelegated this approval authority to the Director of the Land and Chemicals Division. This approval is based on our finding that excavation and removal of contaminated soils, and the use of institutional controls (i.e., Environmental Covenant) to limit human exposure to the remaining on-site PCB-contaminated soil will not pose an unreasonable risk to human health and the environment. This approval is effective as of the date of this letter.

1. You must prepare a Cleanup Completion Report that documents how you conducted the cleanup in accordance with the applicable regulatory requirements and the Work Plan. This report is due within 60 days after completion of the remedial work.

2. Within 60 days of completion of remediation activities, you must submit a draft copy of a notation on the deed (environmental covenant) to the property in accordance with the Ohio Uniform Environmental Covenant Act for EPA review and approval prior to the notification being recorded. The institutional control must state that the property has been used for PCB remediation waste disposal, the property use restrictions detailed within the PCB Soil Cleanup Plan, that the site is acceptable for non-residential property use under the exposure assumptions in the approved PCB Soil Cleanup Plan and as documented in the Cleanup Completion Report, detail the location of any PCB waste left at depth, and that the PCB waste left at depth must not be disturbed by future property owners or, if it is disturbed, it will be disposed of in accordance with 40 C.F.R. § 761.61.

3. If/when the currently "inaccessible" remaining PCBs adjacent to utility lines and the road in the UST area become accessible for excavation in the future, the soils will be removed and handled according to the SMP.

4. If CBS enters into an agreement to sell or transfer the facility to a new owner, CBS shall advise the new owner in writing of this EPA risk-based PCB remediation approval, and must notify EPA thirty days prior to any change in ownership of the property. Such notice must include the name, address and telephone number of the new owner, and the name of the new owner's contact person for this matter.

5. You must notify EPA within 30 days of any changes in land use that render the assumptions used in the site-specific risk assessment no longer valid.

6. CBS will implement a groundwater monitoring program upon completion of the PCB removal.

    a) CBS will submit a groundwater monitoring plan for the former UST area within 30 days of this Approval for review and approval by EPA. The groundwater monitoring plan will include sufficient monitoring wells (including MW-5) to determine if PCBs are migrating to groundwater from the PCB impacted material that remains in place.

b) CBS will sample and analyze all groundwater wells semiannually for PCBs for the first two years. If PCB levels remain below the EPA Maximum Contaminant Level (MCL) 0.5 micrograms per liter (μg/L) during that period, monitoring frequency may be reduced to annual for three years thereafter. If PCB levels in all of the groundwater monitoring wells remain below 0.5 μg/L after five years, groundwater monitoring may be terminated.

c) CBS will record and maintain the results of each groundwater monitoring event. CBS will submit an annual report to EPA identifying groundwater monitoring results. CBS will maintain such records will as long as it owns the Facility and underlying property, and will transfer those records to any subsequent owners at the time of conveyance.

EPA shall not consider this project complete until it has received all submittals required under this Approval. Upon EPA receipt and review of the submittals, we may request any additional information necessary to establish that the work has been completed in accordance with 40 C.F.R. Part 761, the PCB Soil Cleanup Plan, and this Approval.

CBS is responsible for ensuring continued compliance with all applicable provisions of the Toxic Substances Control Act (TSCA), the federal PCB regulations, and the conditions of this Approval. Any departure from the conditions of this Approval and Work Plan must receive prior written authorization from this office. Further, this Approval does not relieve CBS from compliance with any other federal, State, or local regulatory requirements. This Approval does not preclude EPA from initiating any enforcement action, including an action seeking civil penalties, suspension or termination of the Approval for any violation, or requiring additional cleanup should CBS fail to abide by this Approval. All conditions of this Approval and other applicable requirements of TSCA and its implementing regulations will continue to apply to the Site after any transfer in ownership.

If you have any questions regarding this approval, please do not hesitate to call Greg Rudloff, of my staff, at (312) 886-0455.

Sincerely,

Margaret M. Guerriero
Director
Land and Chemicals Division

REVISED SOIL MANAGEMENT PLAN

Former Westinghouse Electric Company Apparatus Repair Facility
1050 Laidlaw Avenue
Cincinnati, Ohio

300 Penn Center Blvd., Suite 800
Pittsburgh, PA 15235
800-883-3266

Project No. 0097235.21/003
CBS Corporation
May 12, 2016

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APPENDICES

1. INTRODUCTION

On behalf of CBS Corporation (CBS), successor in interest to Westinghouse Electric Corporation (Westinghouse), Woodard & Curran has prepared this Revised Soil Management Plan (SMP) for the Former Westinghouse Apparatus Repair Facility (the Site) located at 1050 Laidlaw Avenue in Cincinnati, Ohio. This Revised SMP, which is a revision of the SMP that was included in the U.S. Environmental Protection Agency (USEPA)-approved Soil Cleanup Plan (Cleanup Plan) (Woodard & Curran, July 28, 2015), is based on information provided in the Cleanup Plan, and provides guidance on handling and placement of disturbed soils within the identified areas, as shown on Figure 1. The contaminant of concern in site soils is polychlorinated biphenyls (PCBs). This Revised SMP is intended for use in conjunction with future construction and redevelopment activities at the Site, and shall not be modified without first providing notice to USEPA, Region V and obtaining USEPA approval.

The details regarding site history, background, and environmental conditions are provided in the Cleanup Plan and are summarized below.

1.1 SITE DESCRIPTION

The Site is located in an industrial setting and covers an area of approximately 6.9 acres. The Site is bounded to the south by Laidlaw Avenue. Surrounding properties to the north, south, and west consist of industrial facilities and a residential area to the east. A paved access road bounds the Site to the west from the adjacent 1020 Laidlaw Avenue facility, which was owned by Westinghouse for warehousing and not associated with the manufacturing operations of the Site. The site location is shown on Figure 1 in the Cleanup Plan, and a Site Plan is presented as Figure 2 in the Cleanup Plan.

The Site formerly contained one building (1050 Laidlaw Avenue Building), which was reportedly constructed in 1947, and occupied approximately 80,000 square feet. The building was demolished in 2012 and included the removal and offsite disposal of associated concrete flooring. Four steel underground storage tanks (USTs) were formerly located along the west side of the 1050 Laidlaw Avenue Building, which included three 15,000-gallon oil USTs and a 30,000-gallon heating oil UST. The oil USTs, which were installed in 1949, were used to store new, test, and used oil, and were taken out of service and removed in 1995.

1.2 SITE HISTORY

The facility operated between 1949 and 1986 and was used as a manufacturing and repair center by Westinghouse. Operations involved the manufacturing, testing, and repair of a variety of electrical equipment, including motors and transformers. In 1986, the repair services operations were sold to the Eastern Electric Apparatus Repair Co., Inc. (Eastern Electric). Eastern Electric continued to operate the electrical repair business at the Site until 1995.

In 1996, Equitable Real Estate Investment Management sold the property to Westinghouse. Westinghouse subsequently sold the property to Quality Associates in late 1996. The property was subsequently purchased by EPHS Investments II, LLC in 1998. More recently, the 1050 Laidlaw Avenue Building was also formerly occupied by a paper recycling tenant, followed by a roofing materials supply tenant. The property was sold to CBS in January 2011.

The Site is currently vacant with no structures.

1.3 SUMMARY OF SITE CONDITIONS

Based on soil data collected as part of several environmental assessments and investigations conducted at the Site between 1989 and 2013, residual concentrations of PCBs were identified across portions of the Site. Total PCB concentrations were generally higher at depth (between 15 and 26 feet below ground surface [bgs]) in the former UST area. This area of the Site also exhibited elevated total PCB concentrations in surface soil (between 0 and 2 feet bgs). Across the remaining portions of the Site (i.e., outside the former UST area), residual concentrations of total PCBs were significantly lower, with concentrations at most sample locations less than 1 milligram per kilogram (mg/kg) and limited to surface soils.

Soil remediation was conducted to remove site soils that are present with total PCB concentrations above the unrestricted use cleanup level of 1 mg/kg between 0 and 4 feet bgs, as well as soils with total PCB concentrations above a site-specific cleanup level of 121 mg/kg between 4 and 6 feet bgs. Note that this site-specific cleanup level is a calculated risk-based concentration developed for only a future construction worker scenario at the Site, and is based on restricted use (i.e., limited only to future construction-related activities) at depths greater than 4 feet bgs and up to 6 feet bgs.

The objectives of this Revised SMP are to provide guidelines that will be protective of workers that could potentially be exposed to impacted soils on the Site during future soil disturbance activities (e.g., utility work, redevelopment, building construction) subsequent to the soil remediation, and to allow for safe beneficial reuse of soils onsite, as appropriate, with respect to applicable rules and regulations current at that time. Use of the Revised SMP is required for proper handling of soils at depths greater than 4 feet bgs. In addition, disturbance of soils at depths greater than 6 feet bgs is prohibited unless performed by trained construction (or remediation) workers and mitigated via use of a site-specific health and safety plan. Areas of the Site with total PCB concentrations greater than 1 mg/kg at depths greater than 4 feet bgs are shown on Figure 1, and are referred to in this Revised SMP as “identified areas.” As depicted on Figure 1, the identified areas amount to approximately 13 percent of the entire site area.

Section 2.0 of the Revised SMP describes the scope of activities covered, and implementation procedures are outlined in Section 3.0. Guidance for personnel considering or undertaking the disturbance of soils at the Site is included as Table 1. Contractor guidelines for minimum requirements for health and safety plans are presented in Appendix A.

2. SCOPE OF ACTIONS COVERED

Potential future earth disturbances at the Site may involve the excavation, handling, processing, treatment, storage, or disposal of soils that require management consistent with relevant provisions of applicable rules and regulations current at that time. Activities that require implementation of this Revised SMP include, but are not limited to, the following:

- General earthmoving activities
- Utility and foundation construction
- Soil disturbance for landscaping
- Drilling of soil/geotechnical borings
- Monitoring well abandonment

If unanticipated earthmoving activities are required within the site boundaries (e.g., immediate repair of sudden pipe failure, etc.), a representative of the site property owner will identify and retain a qualified contractor that possesses the capability and necessary experience required to handle potentially impacted soils. Material excavated from soil disturbance activities at the Site must be managed in accordance with all applicable laws and regulations at the time of said disturbances and this Revised SMP.

3. PLAN IMPLEMENTATION PROCEDURES

3.1 NOTIFICATION

Prior to disturbance of soils within the identified areas at the Site, a representative of the site property owner shall be notified and made aware of the planned activities. The site representative will be responsible for approving specific soil management and characterization activities. Contact information for the representative of the site property owner is:

Mr. Dean O. Reed
CBS Corporation
20 Stanwix Street, 10th Floor
Pittsburgh, PA 15222
Telephone: (412) 642-4162

In addition, the USEPA and the Ohio Environmental Protection Agency, Southwest District Office shall be notified at least 30 days prior to disturbance of soils at depths greater than 6 feet bgs within the identified areas shown on Figure 1, except in the event of an emergency such as a utility line break. Figure 1 shall be revised following any regrading or excavation at the Site. This is to ensure that any modifications of the topographic surface will be reflected on Figure 1 so that in the future, it is possible to identify when requirements based on depth of excavation bgs are triggered. The following sections discuss criteria for these actions. Table 1 outlines the specific actions required to implement this Revised SMP.

3.2 SOIL EXCAVATION AND STOCKPILE MANAGEMENT PROCEDURES

Soils excavated from the identified areas must be stockpiled separately based on depth of excavation: 0 to 4 feet bgs and greater than 4 feet bgs. **Note that disturbance of soils at depths greater than 6 feet bgs in the areas of remaining impacts is prohibited unless performed by trained construction (or remediation) workers and mitigated via use of a site-specific health and safety plan**. Contractor must submit a site-specific health and safety plan to the representative of the site property owner for review prior to implementing excavation activities at depths greater than 6 feet bgs.

During excavation, the contractor shall maintain a log of soils excavated by site area and document the final disposition of those soils (e.g., soil retained onsite for reuse or shipped offsite). The temporary stockpiles shall be tracked to provide data necessary to locate any stockpile within the Site and the origin of the soil within each stockpile.

Clean Soils Stockpile Management (0 to 4 feet bgs excavation)

At the end of each day, clean soil stockpiles (soil generated from excavation from 0 to 4 feet bgs which can be used in an unrestricted manner at the Site) must be covered with a minimum of 10-mil polyethylene sheeting and secured to prevent strong winds from removing the cover, to prevent fugitive dust generation, and/or soil run-off.

Contaminated Soils Stockpile Management (Greater than 4 feet bgs excavation)

The following are guidelines for managing potentially impacted soils excavated in the identified areas (Figure 1) from greater than 4 feet bgs.

Potentially impacted soil generated from excavation greater than 4 feet bgs must be placed on and covered with a minimum of 10-mil polyethylene sheeting. A 1-foot to 2-foot high berm of baled hay or clean fill with the 10-mil polyethylene sheeting extended over the berm, reaching the exterior ground surface, shall be constructed. If more than one sheet of polyethylene is needed to line the ground beneath the placed soil, each section of sheeting must

overlap by at least 3 feet. At the end of each day, the contaminated soil stockpiles must be covered with polyethylene sheeting and secured to prevent strong winds from removing the cover, to prevent fugitive dust generation, and/or soil run-off.

For any location within the Site, if potentially impacted soils are encountered in a given area from greater than 4 feet bgs based on odors, soil discoloration, buried containers, or other materials contributing to a potential release, etc., the contractor must stop further excavation work in that area and contact the representative of the site property owner for specific soil management guidance.

3.3 SOIL MANAGEMENT – ONSITE REUSE

The following are guidelines for onsite reuse of stockpiled soils.

Onsite Reuse of Clean Soils

Stockpiled soils excavated from the 0- to 4-foot bgs depth that are deemed suitable for use as construction backfill can be used anywhere onsite.

Onsite Reuse of Contaminated Soils

Stockpiled potentially impacted soils excavated from greater than 4 feet bgs must be characterized before soils are deemed suitable for use as construction backfill.

The contractor must sample stockpiled soil excavated from the identified areas at depths greater than 4 feet bgs. A select number of soil samples that are representative of a soil stockpile(s) shall be collected and submitted for laboratory analysis of PCBs using USEPA Method 8082. Based on analytical results, the stockpiled soil may be used onsite or disposed of offsite. If all analytical results for a given stockpile indicate total PCB concentrations are less than or equal to 1 mg/kg, the stockpiled soil can be used anywhere onsite. If an analytical result for a given stockpile indicates total PCB concentrations are greater than 1 mg/kg, the stockpiled soil must be disposed of offsite in accordance with applicable local, state, and federal regulations, as described in Section 3.4 below. Existing soil data from previous site investigations for a targeted excavation area(s) may be used to assist in characterizing that area(s).

Prior to sample collection, contractor must obtain approval of the sampling and analysis plan from the representative of the site property owner, and analytical results must be provided to the site property owner.

3.4 SOIL MANAGEMENT - OFFSITE DISPOSAL

Stockpiles of soil (regardless of depth that the soil originated from) that are deemed unsuitable for use as backfill must be disposed of offsite in accordance with applicable local, state, and federal regulations. A select number of soil samples that are representative of a soil stockpile(s) shall be collected and submitted for laboratory analysis of PCBs using USEPA Method 8082. Additional analysis may be required by the disposal facility to characterize the soils.

Based on characterization sample results, stockpiled soils with total PCB concentrations greater than 50 mg/kg shall be disposed of at a Resource Conservation and Recovery Act (RCRA) Subtitle C landfill permitted to accept PCB remediation waste. Excavated soils with total PCB concentrations less than 50 mg/kg shall be disposed of at a landfill meeting the requirements specified in 40 Code of Federal Regulations (CFR) 761.62(b). Approvals for offsite disposal shall be obtained in advance of shipment. Disposal documentation shall be provided to the USEPA, Region V and site property owner representative upon completion of the project. As excavated soil will not be stockpiled in a 40 CFR 761.65(b) storage area, soils shall be removed from the Site within 30 days of completion of excavation.

TABLE

TABLE 1
ACTION OUTLINE
FORMER WESTINGHOUSE ELECTRIC COMPANY
APPARATUS REPAIR FACILITY
1050 LAIDLAW AVENUE
CINCINNATI, OHIO

BEFORE any disturbance of soils:

1. Contact the site property owner representative to discuss proposed activities and coordinate utility clearances.

2. Review health and safety procedures with the site property owner representative. The minimum personal protective equipment for workers disturbing soils will include the following:

    - hard hats
    - safety glasses
    - steel-toed boots
    - Tyvek coveralls
    - neoprene rubber gloves
    - neoprene rubber boots

    Confirm health and safety procedures for implementation.

3. Notify U.S. Environmental Protection Agency prior to disturbing soils at depths greater than 6 feet below ground surface within the identified areas.

4. Select soil management option for soils excavated from greater than 4 feet below ground surface.

5. Consult with site property owner representative as to what soil characterization will be necessary. Develop a specific plan and provide to site property owner representative for review.

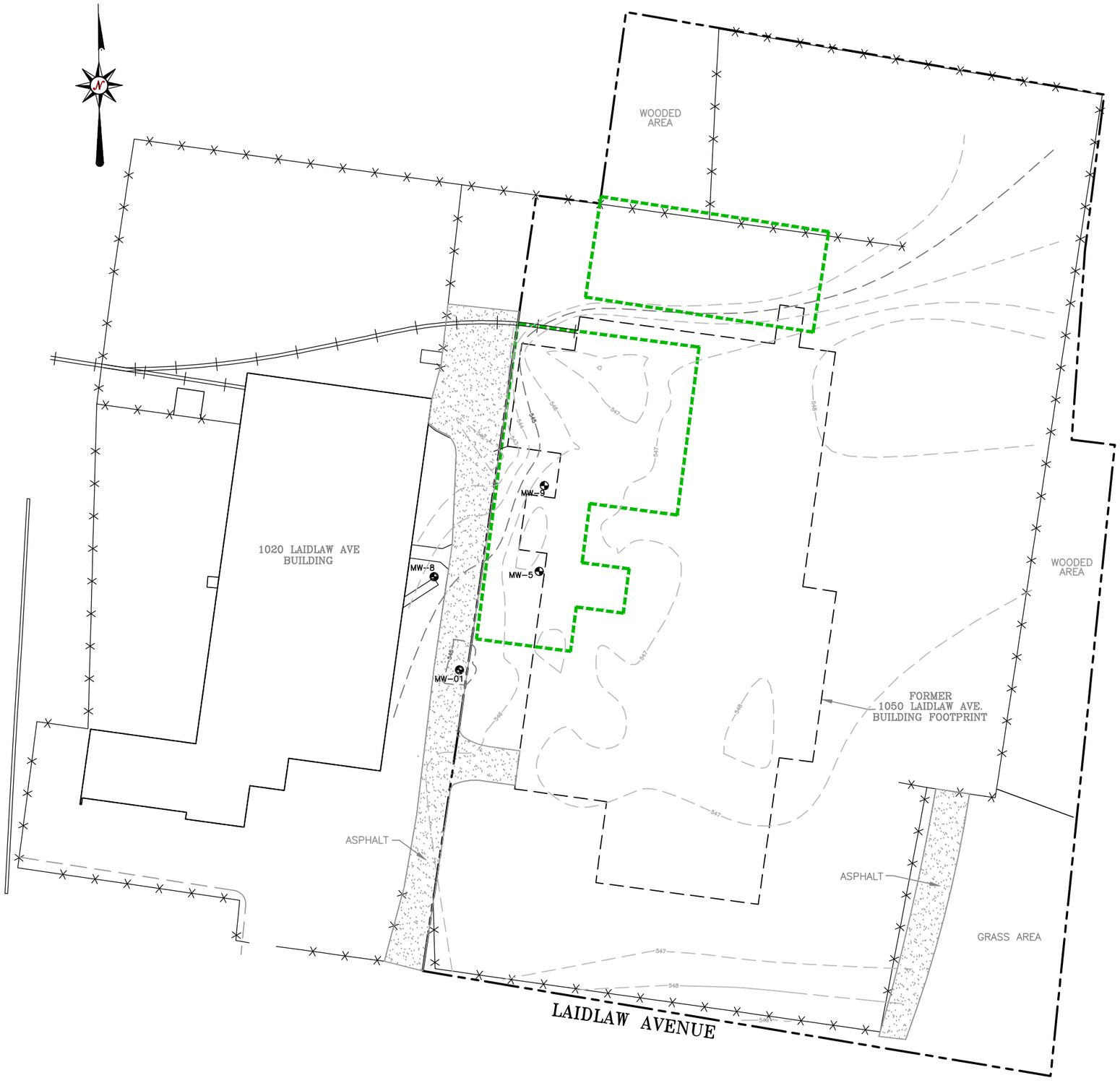
6. Undertake characterization.

7. Discuss characterization results with the site property owner representative.

8. Implement soil management option. Document soil management actions. Submit documentation to the site property owner representative and U.S. Environmental Protection Agency, Region V.

FIGURE

DRAWING NUMBER 97235E32



LEGEND:

- MW-5 ⊕ MONITORING WELL LOCATION
- FORMER BUILDING FOOTPRINT
- FENCE
- PROPERTY LINE
- RAILROAD TRACKS
- 547 TOPOGRAPHIC CONTOUR
- IDENTIFIED AREAS

SCALE
40 0 40 80 FEET

REVISIONS			
REV.	DESCRIPTION	DATE	APPROVED

FIGURE 1
IDENTIFIED AREAS OF THE SITE WITH TOTAL PCB CONCENTRATIONS GREATER THAN 1 mg/kg AT DEPTHS GREATER THAN 4 FEET BELOW GROUND SURFACE

FORMER WESTINGHOUSE ELECTRIC CO.
APPARATUS REPAIR FACILITY
1050 LAIDLAW AVE, CINCINNATI, OHIO

PREPARED FOR
CBS CORPORATION
PITTSBURGH, PENNSYLVANIA

WOODARD &CURRAN
300 Penn Center Blvd.
Suite 800
Pittsburgh, PA 15235
(412) 241-4500
Fax: (412) 241-7500

SIZE	SCALE	REV.	DRAWING NUMBER
E	SCALE: SHOWN	—	97235E32

DRAWN BY:	D.J. Martino	DATE: 02-16-16
CHECKED BY:	R.E. Jones	DATE: 02-16-16
APPROVED BY:	J.J. Pytlak	DATE: 02-16-16

PLOT SCALE: 1=1

APPENDIX A: CONTRACTOR'S GUIDELINES FOR MINIMUM REQUIREMENTS, HEALTH AND SAFETY PLANS

APPENDIX A
CONTRACTOR'S GUIDELINES FOR MINIMUM REQUIREMENTS
HEALTH AND SAFETY PLANS
FORMER WESTINGHOUSE ELECTRIC COMPANY APPARATUS REPAIR FACILITY
1050 LAIDLAW AVENUE
CINCINNATI, OHIO

A1.0 GENERAL REQUIREMENTS

This document describes the minimum health, safety, and emergency response requirements to be addressed by contractors involved in impacted soil disturbance activities within the site area. Specifically, this document is applicable to disturbance of site soils at depths greater than 6 feet below ground surface. The contractor shall submit a comprehensive health and safety plan (HASP), in accordance with Occupational Safety and Health Administration (OSHA) 29 Code of Federal Regulations (CFR) 1910.120, which minimally addresses those subjects identified in subsequent sections of the Soil Management Plan. The responsibility for development, implementation, and enforcement of the HASP lies with the contractor and his health and safety personnel.

A2.0 PROJECT ORGANIZATION

The HASP shall identify the contractor's key health and safety personnel, including the corporate health and safety officer and onsite health and safety coordinator, and shall specify the scope of duties of these personnel.

A3.0 SITE DESCRIPTION

The HASP shall include a discussion of background site information, including characteristics of the compounds of interest. The site shall be designated as the contractor's work area. The work area shall be provided on a figure in the HASP.

A4.0 SITE HAZARD ASSESSMENT

The HASP shall include a detailed discussion of the hazards (biological, chemical, and/or physical) present to workers. Toxicity, potential routes of exposure, and relevant OSHA/U.S. Environmental Protection Agency (USEPA) standards related to the hazards shall be addressed. A relative assessment of risk shall be developed for each task identified in the project's scope of work.

A5.0 TRAINING REQUIREMENTS

The HASP shall include a description of necessary training (hazardous waste, confined space, etc.) required for contractor employees and other site visitors involved in onsite activities. The contractor shall provide documentation to support training as completed and current for site personnel.

A6.0 MEDICAL SURVEILLANCE

The HASP shall describe the medical surveillance program and medical examination components required for all contractor employees involved in onsite activities, as specified in 29 CFR 1910.120 and 1910.134. The contractor shall provide copies of medical certificates for site personnel upon request.

A7.0 HAZARD CONTROLS

The HASP shall detail control measures that will be utilized to reduce the potential hazards identified in the site hazard assessment. These controls may consist of engineering controls, such as watering to reduce airborne dust; administrative controls, such as locating the support zone upwind of excavation areas; and personal protective equipment.

A8.0 AIR MONITORING

The HASP shall include provisions for monitoring of potentially harmful airborne chemical and/or physical agents, as identified in the site hazard assessment. Types of monitoring (breathing zone, area, perimeter) shall be specified, as well as the duration of sampling and types of instruments to be utilized by the contractor. Substance-specific action levels will be established prior to the commencement of onsite activities, to ensure that site personnel and the public are protected at all times. Field monitoring logs shall be maintained to record instrument readings, as appropriate. Field calibration logs shall be maintained for each instrument utilized by the contractor at the site.

A9.0 PERSONAL PROTECTIVE EQUIPMENT

Based upon the site hazard assessment, the contractor shall select the appropriate levels of personal protection for each task identified in the project's scope of work. Required and optional equipment shall be identified in the HASP for each specific level of protection (A through D) as recommended in the OSHA Guidance Manual for Hazardous Work Site Activities (National Institute of Occupational Safety and Health [NIOSH], 1985). The contractor shall establish provisions to clearly identify when site conditions warrant an upgrade or downgrade in the level of protection.

A10.0 RESPIRATORY PROTECTION

If warranted based upon air monitoring results, the contractor shall develop and detail a respiratory protection program that meets the requirements of 29 CFR 1910.134 and includes all site workers that may have to don respiratory protection. The program shall address medical clearance; fit-testing; selection of appropriate respirator/cartridge combinations; and employee training in use, care, and limitations of the respirators.

A11.0 SITE CONTROL

The HASP shall include provisions for establishing work zones within the work area, including exclusion zones, contamination reduction zones, and support zones, as appropriate. Provisions for site security shall also be discussed.

A12.0 DECONTAMINATION

The HASP shall describe detailed procedures to be followed for the decontamination of personnel and equipment. Included will be a description of the materials to be utilized, as well as the collection methods in preparation for disposal.

A13.0 HEAT/COLD STRESS

The HASP shall address prevention, recognition and treatment of heat or cold disorders due to temperature extremes, as appropriate.

A14.0 EMERGENCY RESPONSE

The HASP shall include emergency site procedures to be followed in the event of extraordinary conditions that may occur during soil sampling activities at the site. In addition to site response procedures, the contractor shall provide procedures for requesting offsite assistance and for notifying offsite agencies of site emergencies.

A14.1 Response Considerations

The HASP shall include procedures for handling emergencies in a manner that minimizes health and safety risks to site personnel and the public. The contractor shall establish procedures for administering first-aid or other appropriate initial actions; for reporting all accidents and unusual events to the appropriate personnel, including the owner representative; for providing the quickest route to the local hospital; for conducting the emergency response in an efficient, rapid, and safe manner; and for providing the owner representative with an incident report.

A14.2 Responsibilities

The HASP shall define the responsibilities of the contractor's health and safety personnel in the event of an emergency, including notification of the appropriate public response agencies.

A14.3 Public Response Agencies

The HASP shall include a list of public response agencies and phone numbers to be contacted in the event of an emergency. The contractor shall also identify and provide directions to the nearest hospital or medical facility.

A14.4 Emergency Response Equipment

The HASP shall include a list of emergency equipment to be provided at the site, including, but not limited to, first-aid kits, fire extinguishers, and other equipment considered necessary to support emergency activities.

A14.5 Accidents and Non-Routine Events

The HASP shall outline several types of accidents or emergencies that may occur during activities on site, and the procedures to be followed in the event of an incident. Prime consideration shall be to provide appropriate initial response to assist those in danger without placing additional personnel at unnecessary risk. Types of incidents to be discussed in the HASP shall include worker injuries (physical injuries as well as chemical exposures, eye and skin exposures, inhalation, and ingestion). The HASP shall also outline procedures to be followed in the event of small and large fires, including the notification of response agencies if required.

A15.0 SAFETY MEETINGS

The HASP shall provide for a project kick-off safety meeting to be held by the contractor for its employees and subcontractors, if appropriate. This meeting will be held on site prior to the commencement of work and shall address potential hazards associated with the project's scope of work. Additional safety meetings will be held prior to the commencement of daily activities that may introduce new hazards or require additional review by site employees. Logs shall be maintained for all meetings held and include names of instructors, attendees, and topics covered.

woodardcurran.com

COMMITMENT & INTEGRITY DRIVE RESULTS